

Davor Rukavina, Esq.  
Texas Bar No. 24030781  
Conor P. White, Esq.  
Texas Bar No. 24125722  
500 N. Akard Street, Suite 4000  
Dallas, Texas 75201-6659  
Telephone: (214) 855-7500  
Facsimile: (214) 855-7584  
[drukavina@munsch.com](mailto:drukavina@munsch.com)  
[cwhite@munsch.com](mailto:cwhite@munsch.com)  
COUNSEL FOR SCOTT M. SEIDEL,  
CHAPTER 7 TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	Case No. 22-31641-mvl-7
GOODMAN NETWORKS, INC.,	§	
	§	(Chapter 7)
Debtor.	§	
	§	
	§	
SCOTT M. SEIDEL, TRUSTEE; and	§	
GNET ATC, LLC,	§	
	§	ADVERSARY PROCEEDING
Plaintiffs,	§	NO: 23-03072-mvl
	§	
v.	§	
	§	
18920 NW 11th, LLC; JAMES GOODMAN;	§	
STEVEN ZAKHARYAYEV; EVELINA	§	
PINKHASOVA; PEOPLE NQ INC.;	§	
JJC & PEOPLE LLC; GDMN FAMILY	§	
INVESTMENTS 2, LLC,	§	
	§	
Defendants.	§	
	§	

**APPENDIX IN SUPPORT OF TRUSTEE’S MOTION FOR PARTIAL SUMMARY  
JUDGMENT AGAINST 18920 NW 11TH, LLC**

COMES NOW Scott M. Seidel (the “Trustee”), the plaintiff in this Adversary Proceeding,  
and files this his *Appendix In Support of Trustee’s Motion for Partial Summary Judgment Against  
18920 NW 11th, LLC* (the “Appendix”), respectfully stating as follows:

Pursuant to Local Rule, the Trustee offers the following documents, testimony, and evidence in support of his *Trustee's Motion for Partial Summary Judgment Against 18920 NW 11th, LLC*:

<b>Tab</b>	<b>Description</b>	<b>Range</b>
A	GDMN Share Purchase Agreement (Zakharyayev Depo Exh. 14)	APP0001-14
B	JJC&P Share Purchase Agreement (Zakharyayev Depo Exh. 13)	APP0015-28
C	People Share Purchase Agreement (Zakharyayev Depo Exh. 12)	APP0029-42
D	Redemption Notice (Zakharyayev Depo Exh. 3)	APP0043
E	Cover E-mail for Redemption Notice (Zakharyayev Depo Exh. 2)	APP0044
F	E-mail string (Zakharyayev Depo Exh. 11)	APP0045-55
G	Declaration of William Roberts (With Expert Report Attached)	APP0056-80
H	18920-0000052-55	APP0081-84
I	18920-0000170-73	APP0085-88
J	18920-0000119-123	APP0089-93
K	Seventh Amended and Restated Shareholder Agreement	APP0094-123
L	18920 Second Amended Interrogatory Responses	APP0124-133
M	Zakharyayev Second Amended Interrogatory Responses	APP0134-142
N	Pinkhasova Second Amended Interrogatory Responses	APP0143-149
O	James Goodman Amended Interrogatory Responses	APP0150-158
P	JJC & People Amended Interrogatory Responses	APP0159-168
Q	GDMN Family Amended Interrogatory Responses	APP0169-178
R	People NQ Amended Interrogatory Responses	APP0179-189
S	E-mail string (Zakharyayev Depo Exh. 4)	APP0190-192
T	ARRIS Solutions Joinder to Involuntary	APP0193-283
U	ARRIS Original Petition	APP0284-306
V	E-mail chain March 10, 2022 (Zakharyayev Depo Exh. 6)	APP0307-308
W	Share Purchase Agreement (Zakharyayev Depo Exh. 5)	APP0309-325
X	Settlement Agreement (Zakharyayev Depo Exh. 16)	APP0326-329
Y	Zakharyayev Deposition Transcript (9/13/24)	APP0330-778
Z	Pinkhasova Deposition Transcript (9/13/24)	APP0881-924
AA	Certified Copy of Sixth Amended and Restated Cert. of Formation	APP0779-795
BB	Excerpts of Anthony Rao Deposition (with Exhibit 25 thereto)	APP0796-826
CC	All March, 2022 Bank and Other Statements	APP0827-880
DD	Affidavit of Michael Schimpf	APP0881-883
EE	Declaration of Gavin Wilkinson	APP0884-885
FF	Declaration of Davor Rukavina	APP0886-890
GG	Declaration of Scott M. Seidel	APP0891-893

RESPECTFULLY SUBMITTED this 23d day of January, 2025.

**MUNSCH HARDT KOPF & HARR, P.C.**

By: /s/ Davor Rukavina

Davor Rukavina, Esq.  
Texas Bar No. 24030781  
Conor P. White, Esq.  
Texas Bar No. 24125722  
500 N. Akard Street, Suite 4000  
Dallas, Texas 75201-6659  
Telephone: (214) 855-7500  
Facsimile: (214) 855-7584  
Email: [drukavina@munsch.com](mailto:drukavina@munsch.com)  
Email: [cwhite@munsch.com](mailto:cwhite@munsch.com)

**COUNSEL FOR SCOTT SEIDEL,  
CHAPTER 7 TRUSTEE**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on the 23d day of January, 2025, true and correct copies of this document, with all exhibits referenced herein, were served via the Court's CM/ECF system on the following counsel for the defendants:

Michael A Cancienne on behalf of Defendants 18920 NW 11th, LLC, Evelina Pinkhasova, and Steven Zakharyayev  
[mcancienne@jlcfirm.com](mailto:mcancienne@jlcfirm.com)

Randall A. Pulman on behalf of Defendants GDMN Family Investments 2, LLC, JJC & People LLC, People NQ Inc., and James Goodman  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com), [jgonzaless@pulmanlaw.com](mailto:jgonzaless@pulmanlaw.com); [mvilla@pulmanlaw.com](mailto:mvilla@pulmanlaw.com).

/s/ Davor Rukavina

Davor Rukavina, Esq.